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Federal Communications Commission
Office of Secretary

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
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Re: Comtel Telcom Assets LP, Comtel Virginia LLC, VarTec Telecom, Inc., Excel Telecommunications, Inc. and VarTec Solutions, Inc., Joint International and Domestic Application for Consent to Transfer of Assets and Assignment of Authorization

WC Docket No. 05-260; File Nos. ITC-ASG-20050804-00305; ITC-ASG-20050804-00306; ITC-ASG-20050804-00307

Submission of Additional Information in Accordance with Section 1.65 of the Commission's Rules

Dear Ms. Dortch:

Pursuant to Section 1.65 of the Commission's rules, Comtel Telcom Assets LP ("Comtel") and its wholly owned subsidiary, Comtel Virginia LLC ("Comtel Virginia") (together, the "Assignees"), provide the following information.

On August 4, 2005, the Applicants filed the above-captioned Application for transfer of assets from The VarTec Companies to the Assignees. The Application was granted by the International Bureau on September 8, 2005 and by the Wireline Competition Bureau on September 19, 2005, but the assignment of assets has not yet been consummated.¹

On January 17, 2006, Comtel entered into an Agreement whereby certain members of Comtel's management team were issued minority, non-controlling, voting interests in Comtel and in Comtel's general partner, Comtel Assets Inc. (through investment trusts and limited

¹ *International Authorizations Granted*, Public Notice, DA No. 05-2416 (rel. Sept. 8, 2005); *Notice of Streamlined Domestic 214 Application Granted*, Public Notice, DA No. 05-2461 (rel. Sept. 19, 2005).

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liability companies owned and controlled by such management and their families). The nine entities holding management's interests will collectively hold a 9.06% voting interest in Comtel Assets (with each entity holding voting interest ranging from .14% to 4.08%) and a 8.97% interest in Comtel (with each entity holding voting interest ranging from .13% to 4.04%). Consistent with the Application, Comtel's general partner, Comtel Assets Inc., will continue to control the Assignees and its limited partner, Comtel Assets Corp., will continue to own over 90 percent of the voting interests of the Assignees. An organizational chart displaying the management's voting interests in Comtel and Comtel Assets Inc. is attached hereto as Exhibit A.

As stated, the aforementioned minority interests of management will not affect the direct or indirect control of the Assignees. All of the new direct equity holders are entities formed under the laws of the United States. Further, all of these entities are 100 percent owned and controlled by United States citizens.

If you have any questions, please contact the undersigned at (202) 637-2200.

Respectfully submitted,



Jeffrey A. Marks
Jessica W. Hafer

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Virginia LLC*

cc: Susan O'Connell, International Bureau
Jodi Cooper, International Bureau
Renee Crittendon, Wireline Competition Bureau
Tracey Wilson Parker, Wireline Competition Bureau
Becky Gipson, The VarTec Companies

EXHIBIT A

